

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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|-----------------------------------|---|------------------|
| _____ |) | |
| EUCLIDES SOTO, LOUIS A. MARTINEZ, |) | NO. 04-10892-JLT |
| JOSE RAMIREZ, CLEMENTE HERNANDEZ, |) | |
| CESAR PIZARO, ELISON PENA, |) | |
| JUAN COLON, JOSE ORTIZ, |) | |
| RAFAEL TORRES, ANGEL BAEZ, |) | |
| ANTONIO MARTINEZ, WILFREDO ORTIZ, |) | |
| EULOGIO ORTIZ, MIRRAIN MIRANDA, |) | |
| RAFAEL MORENO, NELSON ACEVEDO, |) | |
| and RAMON RODRIGUEZ, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | |
| |) | |
| UNITED STEELWORKERS OF AMERICA, |) | |
| ITS LOCAL 421-U, ET AL. |) | |
| |) | |
| DEFENDANTS |) | |
| _____ |) | |

PLAINTIFFS' WITNESS LIST

The plaintiffs disclosed on February 7, 2005 the following witnesses who will be used at trial and the names and addresses are provided for the jury:

1. Lowell Alexander, Keeper of Records of Milford, MA;
2. Kenneth Doucette of Malden, MA;
3. Nelson Acevedo of Dorchester, MA;
4. Angel Baez of Dorchester, MA;
5. Miriam Caminero, Roslindale, MA;
6. Clemente Hernandez of Dorchester, MA;
7. Antonio Martinez of Jamaica Plain, MA;
8. Luis A. Martinez of Roslindale, MA;
9. Jose E. Ortiz of Dorchester, MA;
10. Eulogio Ortiz of Dorchester, MA;

11. Juan R. Colon Ortiz of Boston, MA;
12. Wilfredo C. Ortiz of Dorchester, MA;
13. Elison Pena of Dorchester, MA;
14. Cesar Narciso Pizarro of Dorchester, MA;
15. Jose D. Ramirez Dorchester, MA;
16. Ramon Rodriguez of Florida;
17. Euclides Soto of Brockton, MA;
18. Rafael Torres of Dorchester, MA; and

It is anticipated that they will also be witnesses at trial.

Respectfully Submitted,

Date: December 7, 2005

/s/ Robert O. Berger

Robert O. Berger (BBO #: 038900)

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Boston, MA 02108

Tel (617) 423-7575

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I, Robert O. Berger, hereby certify that I have served a true and exact copy of the above document by electronic transfer or first class mail, postage prepaid on the following named persons:

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Date: December 7, 2005

/s/ Robert O. Berger
Robert O. Berger (BBO #: 038900)